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21 Pittsburgh, Pa.

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

1 LAS VEGAS SANDS, INC. n/k/a LAS  
2 VEGAS SANDS, LLC; and LAS VEGAS  
3 SANDS CORP.,

4 Plaintiff,

5 v.

6 NATIONAL UNION FIRE INSURANCE  
7 COMPANY OF PITTSBURGH, PA.,

8 Defendant.

9 Case No. 2:22-cv-00461-JCM-BNW  
10 Hon. James C. Mahan

11 **CORRECTED STIPULATION PER**  
12 **CLERK'S NOTICE AND [PROPOSED]**  
13 **ORDER TO EXTEND BRIEFING**  
14 **SCHEDULE ON PLAINTIFFS' MOTION**  
15 **TO STAY DISCOVERY PENDING**  
16 **RESOLUTION OF PLAINTIFFS'**  
17 **MOTION FOR PARTIAL SUMMARY**  
18 **JUDGMENT [ECF #50]**  
19  
20 **(FIRST REQUEST)**

Plaintiffs Las Vegas Sands, Inc. n/k/a Las Vegas Sands, LLC, and Las Vegas Sands Corp. (“Plaintiffs”) and Defendant National Union Fire Insurance Company of Pittsburgh, Pa. (“National Union”) (collectively the “Parties”), by and through their respective counsel of record, hereby stipulate to extend the briefing schedule for Plaintiffs’ Motion to Stay Discovery Pending Resolution of Plaintiffs’ Motion for Partial Summary Judgment (“Motion to Stay”) (ECF #50), subject to the Court’s approval, as follows:

1. In light of the holidays, the Parties jointly request an extension of their briefing schedule for the above-referenced motion to allow the Parties sufficient time to complete their opposition and reply. This is the Parties’ first request to extend these deadlines. The Parties agree there is good cause to support the requested extension.

2. On December 23, 2022, Plaintiffs’ filed their Motion to Stay (ECF #50). National Union’s opposition is currently due on January 6, 2023, and Plaintiffs’ reply is currently due on January 13, 2023.

3. On December 27, 2022, the Court (Magistrate Judge Weksler) issued a minute order setting a hearing on the Motion to Stay for January 25, 2023 at 1:00 p.m. ECF #52.

4. The Parties have agreed to the following briefing schedule for the Motion to Stay, subject to the Court’s approval: (a) National Union’s opposition will be filed by January 11, 2023; and (b) Plaintiffs’ reply will be filed by January 18, 2023.

5. The Parties are available for the January 25, 2023 hearing date, or will be available at a future date if the Court continues the hearing in light of the Parties’ requested extension to the briefing schedule.

<b>Event</b>	<b>Existing Date</b>	<b>Proposed Date</b>
National Union’s Opposition to Plaintiffs’ Motion to Stay	January 6, 2023	January 11, 2023
Plaintiffs’ Reply in Support of Motion	January 13, 2023	January 18, 2023

1 to Stay		
2 Hearing Date	January 25, 2023	January 25, 2023 (or a future 3 date convenient for the Court)

4

5 **IT IS SO STIPULATED.**

6 Respectfully submitted,

7 DATED: January 3, 2023

8 HEJMANOWSKI & McCREA LLC  
9 BAUTE CROCHETIERE & HARTLEY LLP

10 By: /s/ Michael J. Hartley

11 Michael J. Hartley  
12 Attorneys for Defendant National Union Fire  
13 Insurance Company of Pittsburgh, Pa.

14 DATED: January 3, 2023

15 KEMP JONES, LLP  
16 COHEN ZIFFER FRENCHMAN & McKENNA LLP

17 By: /s/ Marc T. Ladd

18 Marc T. Ladd  
19 Attorneys for Plaintiffs

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21 **IT IS SO ORDERED.**

22   
Hon. Brenda N. Weksler  
United States Magistrate Judge

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24 Dated: January 4, 2023